## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE LEAGUE PLAYERS' CONCUSSION	) No. 12-md-2323 (AB)	
INJURY LITIGATION	) MDL No. 2323	
	SHORT FORM COMPLAINT	
THIS DOCUMENT RELATES TO:	IN RE: NATIONAL FOOTBALL	
	) LEAGUE PLAYERS' CONCUSSION	
Plaintiff's Master Administrative Long Form Complaint v. National Football	INJURY LITIGATION	
League [et al.],	JURY TRIAL DEMANDED	
Davis et al v. National Football League	) ]	
3: 12-cv-01864		

## **SHORT FORM COMPLAINT**

- 1. Plaintiff Langston Moore brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.
- 2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.
- 3. Plaintiff incorporates by reference the allegations (as designated below) of the Master Administrative Long Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.
- 4. Plaintiff Langston Williams is a resident and citizen of the state of South Carolina, and claims the damages set forth below.
- 5. On information and belief, Plaintiff Langston Williams sustained repetitive, traumatic sub-concussive and concussive head impacts during NFL games and practices. On information and belief, Plaintiff suffers from symptoms of

brain injury caused by the repetitive, traumatic sub-concussive and concussive impacts the Plaintiff sustained during NFL games and practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

Plaintiffs claim damages as a result of:

6.

		_x Injury to Himself	
		_xEconomic Loss	
		_xLoss of services	
<u>DEFENDANTS</u>			
	7.	Plaintiff brings this case against the following Defendant in this action:	
		_xNational Football League	
		xNFL Properties, LLC	
	8.	Plaintiff played in the National Football League for the following teams:	
Arizona	a Cardi	nals, Detroit Lions, and Cincinnati Bengals.	
		CAUSES OF ACTION	
	9.	Plaintiff herein adopts by reference the following Counts of the Master	
Admini	istrativ	e Long-Form Complaint, along with the factual allegations incorporated by	
referer	nce in t	hose Counts:	
		xCount I (Action for declaratory relief – liability against the NFL)	
		_xCount II (Medical Monitoring against the NFL)	
		xCount IV (Fraudulent Concealment against the NFL)	
		_xCount V (Fraud against the NFL)	

x	Count XIII (Negligent Retention against the NFL)	
x	Count XIII (Negligent Retention against the NFL)	
x	Count XVIII (Civil Conspiracy/Fraudulent Concealment against the	
	NFL)	
PRAYER FOR RELIEF		
x		
x	Count XIII (Negligent Retention against the NFL)	
x	Count XII (Negligent Hiring against the NFL)	
x	Count XI (Loss of Consortium against the NFL)	
x	Count X (Negligence post 1994 against the NFL)	
x	Count VI (Negligent misrepresentation against the NFL)	

WHEREFORE, Plaintiff prays for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose law will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorney's fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

## JURY DEMANDED

Pursuant to Rule 38, Federal Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury.

**RESPECTFULLY SUBMITTED:** 

\_s/ Sol H. Weiss\_\_\_\_

Sol H. Weiss

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s/ Pete Strom

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